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555 Twelfth Street, NW
Washington, DC 20004-1206

March 20, 2014

VIA EMAIL AND FEDERAL EXPRESS

Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue, MS-211
Edison, New Jersey 08837

Re: Superior Barrel and Drum Superfund Site

Dear Ms. Hriczko:

This letter responds to the United States Environmental Protection Agency's ("EPA") January 9, 2014 Request for Information pursuant to Section 104(e) of CERCLA ("the 104(e) Request"), sent to Honeywell Safety Products, LLC (EyeSaline) ("Respondent"), concerning the Superior Barrel and Drum Superfund Site ("Site").

As an initial matter, Respondent makes the following objections to and general points with respect to the 104(e) Request:

A. Respondent generally objects to the 104(e) Request to the extent that it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense or common interest privilege, the self-evaluative privilege, or any other applicable privilege or doctrine. Nothing contained in these objections or the responses below is intended as, or shall in anyway be deemed, a waiver of privilege. Respondent further objects to the 104(e) Request to the extent that it seeks confidential or proprietary business information of Respondent or settlement confidential information.

B. Respondent generally objects to the 104(e) Request to the extent that it seeks information and/or documents not in the possession, custody, or control of Respondent.

C. Respondent generally objects to the 104(e) Request to the extent that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence or information necessary or useful to EPA's investigation, or beyond the authority provided in CERCLA Section 104(e).



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D. Respondent generally objects to the 104(e) Request to the extent that it seeks information which may be derived or ascertained from documents already within the knowledge, possession or control of the EPA.

E. This response reflects a diligent search of Respondent's records, but no representation is made that all such records have been located and searched. Respondent reserves the right to supplement this response in the event that it locates additional responsive non-privileged documents or information, but does not assume the obligation to do so.

Notwithstanding the foregoing objections, and preserving and without waiving them, Respondent responds to the Request, incorporating each of the above objections, as follows:

General Information about the Company

1. a. State the correct legal name of the Company.

Honeywell Safety Products USA, Inc. (herein the "Company" or "Respondent").

b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.

Honeywell Safety Products USA, Inc. is a corporation organized in the state of Delaware.

c. State the name(s) and address(es) of the officer(s) of the Company.

The Company's officers are: Mark S. Levy, David M. DeMeo, available at One Firelite Place, Northford, Connecticut, 06472; John Gerald Boss, available at 21925 Field Parkway, Suite 250, Deer Park, Illinois, 60010; John M. Quitmeyer, available at 1985 Douglas Drive, North Dock, Golden Valley, Minnesota, 55422; Winfield Major, available at 900 Douglas Pike, Smithfield, Rhode Island, 02917; and James M. di Stefano, John J. Tus, Paul H. Brownstein, David A. Cohen, Jim Colby, and Lois H. Fuchs, available at 101 Columbia Road, Morristown, New Jersey, 07962.

d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.

Honeywell Safety Products USA, Inc. is a subsidiary of Honeywell International Inc., also incorporated in the state of Delaware. Honeywell International Inc. has no parent companies. It has approximately 1,300 subsidiaries and 131,000 employees worldwide. It

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globally manages business operations through four businesses that are reported as operating segments: Aerospace, Automation and Control Solutions, Performance Materials and Technologies, and Transportation Systems.

Honeywell International Inc.'s executive officers are: David M. Cote; Katherine L. Adams; David J. Anderson; Roger Fradin; Alexandre Ismail; Mark R. James; Terrence S. Hahn; Andreas C. Kramvis; Timothy O. Mahoney; Krishna Mikkilineni, available at 101 Columbia Road, Morristown, New Jersey, 07962.

Honeywell International Inc. acquired Sperian Eye & Face Protection, Inc., the manufacturer of EyeSaline, in 2010. *See infra* Response to Question 3.a. EyeSaline was originally manufactured by the Fendall Company, which was acquired by Sperian Eye & Face Protection, Inc. in 2007. The Sperian Eye & Face Protection business was later reorganized under the umbrella of Honeywell Safety Products USA, Inc.

- e. **If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.**

Please see Response to Question 1.d.

- f. **If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.**

As set forth herein at Response to Question 3.a., after a thorough and diligent search, Respondent is not aware of any entity that transacted business with Superior Barrel and Drum ("SBD").

2. a. **Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.**

Honeywell Safety Products USA, Inc. has a large portfolio of products for eye, face, and hand protection, protective clothing, professional footwear, first aid and hearing and respiratory protection. Please also see Response to Question 1.d and Objection C *supra*.

- b. **Describe your Company's operations from 1974 to the present and identify all chemicals used or produced as a result of your Company's operations**

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during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition.

Please see Response to Question 2.a and Objection C *supra*.

Company's Relationship to Superior Barrel and Drum ("SBD")

3. a. **State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").**

After a thorough and diligent search, Respondent is not aware of any business transaction with SBD for the disposal, treatment, or storage of any Containers. As provided by Ms. Hriczko, found at the Site were six one-gallon containers of EyeSaline, photographs of which are attached as Exhibit 1, and the inventory logs for which are attached as Exhibit 2. The containers bear EPA identifier numbers 1353-1358.

EyeSaline is a emergency eyewash solution. It is a non-hazardous, non-toxic, sterile, saline water solution that is balanced to the pH and salinity of human tears. EyeSaline is sold through distributors. After a thorough and diligent search, Respondent was not able to identify the distributor from which SBD may have purchased the six containers of EyeSaline.

- a. **If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company;**

Please see Response to Question 3.a.

- b. **Provide copies of any contracts or agreements between the Company and SBD;**

After a thorough and diligent search, Respondent did not identify any contracts or agreements between Respondent and SBD. Please also see Response to Question 3.a.

4. a. **For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated;**

Please see Response to Question 3.a.

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- b. State the name, address, and current RCRA Identification Number of each facility;**

Please see Response to Question 3.a.

- 5. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format.**

- a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year;**

Please see Response to Question 3.a.

- b. Identify the number of Containers that were the subject of each such transaction;**

Please see Response to Question 3.a.

- c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.);**

Please see Response to Question 3.a.

- d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company products purchased from SBD, Services rendered to or from the Company to or from SBD, etc.)**

Please see Response to Question 3.a.

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:**

- (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and**

Please see Response to Question 3.a.

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- (2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;**

Please see Response to Question 3.a. A material safety data sheet for EyeSaline is attached as Exhibit 3.

- 6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.**

Please see Response to Question 3.a.

- 7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.**

Please see Response to Question 3.a.

- 8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:**

- a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and**

Please see Response to Question 3.a.

- b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;**

Please see Response to Question 3.a.

- 9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.**

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Please see Response to Question 3.a.

- 10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.**

Please see Response to Question 3.a.

- 11. Identify each person consulted in responding to these questions and all questions on which he or she was consulted.**

The persons consulted in the preparation of all Responses to this 104(e) Request include the following individuals:

- a. Helen Fahy
Remediation Manager
Honeywell International Inc.
- b. Jeanne Wetenhall
Legal Assistant
Honeywell International Inc.
- c. Winfield W. Major
General Counsel
Honeywell Safety Products, Americas
- d. Lynn Sylvain
Global Indirect Sourcing Manager
Honeywell Safety Products USA, Inc.

- 12. Identify any other person or entity (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title(s) and a description of the responsibilities.**

After a thorough and diligent inquiry, Respondent is unable to identify any other person or entity having knowledge of facts relating to the questions which are the subject of this 104(e) Request.

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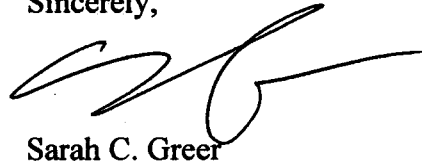
Ms. Bonnie Hriczko
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13. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

After a thorough and diligent search, Respondent is unable to identify additional information or documents that may be relevant or useful to identify other sources who may have disposed of or transported Containers to the Site.

Please contact me if you have any additional questions.

Sincerely,



Sarah C. Greer

Enclosures (3)

cc: Mr. Tom Byrne, Honeywell International Inc.

Mr. William Tucker, Esq, U.S. EPA, Region II

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

District of Columbia
State of _____:

County of _____:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

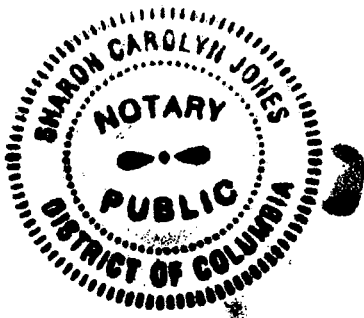
SARAH GREER
NAME (print or type)

ASSOCIATE ATTORNEY
TITLE (print or type)

[Signature]
SIGNATURE

Sworn to before me this 20th
day of March, 2014

[Signature]
Notary Public

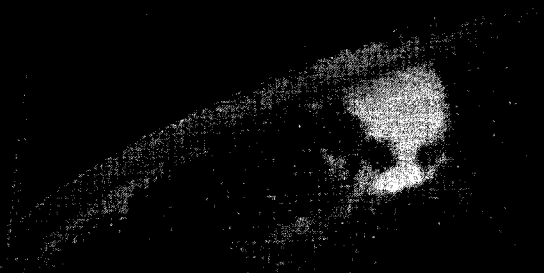
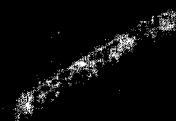


Sharon Carolyn Jones
Notary Public, District of Columbia
My Commission Expires 3/31/2014

Exhibit 1



2018 10 25



1351¹⁰ 1351¹⁰

1351¹⁰ 1351¹⁰

1351¹⁰ 1351¹⁰

2013 10 22

2003 10 22

2003 10 22

2003 10 22

2003 10 22

2013 10 22



25

10/22/13

22 01 0102

~~SECRET~~

~~CONFIDENTIAL~~

CONFIDENTIAL

Exhibit 2

KEMRON ENVIRONMENTAL		DRUM INVENTORY LOG		DRUM NO. <u>1353</u> PROJECT NO. <u>SF 1867</u> PAGE _____ OF _____	
PROJECT LOCATION <u>SUPERIOR BARRELL & DRUM SITE</u>		LOGGER <u>C.C.</u>		DATE <u>10/23/13</u>	
PROJECT CONTACT <u>GARY BELAND</u>		SAMPLER <u>C.C.</u>		TIME _____	
PHONE _____		WEATHER _____			
DRUM TYPE: POLY-LINED <input type="checkbox"/> FIBER <input type="checkbox"/> STEEL <input type="checkbox"/> POLY <input checked="" type="checkbox"/> STAINLESS STEEL <input type="checkbox"/> NICKEL <input type="checkbox"/>					
LID TYPE: RINGTOP <input type="checkbox"/> CLOSE TOP <input checked="" type="checkbox"/>					
DRUM CONDITION: MEET DOT SPEC. <input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR <input checked="" type="checkbox"/>					
DRUM SIZE: 110 <input type="checkbox"/> 85 <input type="checkbox"/> 55 <input type="checkbox"/> 42 <input type="checkbox"/> 30 <input type="checkbox"/> 16 <input type="checkbox"/> 10 <input type="checkbox"/> 5 <input type="checkbox"/> OTHER <u>1 GAL</u>					
DRUM CONTENTS: VOLUME FULL <input checked="" type="checkbox"/> 3/4 <input type="checkbox"/> 1/2 <input type="checkbox"/> 1/4 <input type="checkbox"/> <1/4 <input type="checkbox"/> MT <input type="checkbox"/>					
OVERPACKED: No <input checked="" type="checkbox"/> YES <input type="checkbox"/> OVERPACK TYPE: FIBER <input type="checkbox"/> STEEL <input type="checkbox"/> POLY <input type="checkbox"/> OVERPACK SIZE: _____					
PHYS. STATE		COLOR	CLARITY	LAYER THICKNESS	FIELD ANALYSIS
L A Y E R S	L I Q U I D	S O L I D	G E L D G E	S L U D G E	USE STD COLORS
C L E A R	C L O U D Y	O P A Q U E			
					pH _____ SU _____ PID/OVA <u>0</u> ppm OTHER <u>1-GAL container (virgin)</u>
					DRUM LABELS/MARKINGS
					DOT HAZ _____ UN/NA _____
MFG NAME <u>eyesaline</u> CHEMICAL NAME <u>eye flushing solution</u> ADDITIONAL INFORMATION _____					

<input type="checkbox"/> LABORATORY HAZARD CATEGORIZATION DATA MARK IF DESCRIPTION DOES NOT MATCH THE ABOVE INFORMATION. IF SO, REJECT SAMPLE AND DO NOT PERFORM ANALYSIS												HAZARD CATEGORY: <u>2.1 L</u> ANALYST: <u>pm</u> DATE PERFORMED: <u>10/24/13</u>				
RADIATION: POS <input type="checkbox"/> NEG <input type="checkbox"/> MREM/HR _____																
PHYS. STATE		COLOR	CLARITY	WATER SOL.	REACT	pH	HEX DCM SOL	PER	OX	CN	SUL	BIEL-STEIN	FLASH POINT	PCBS (25ppm)	PCB TEST COMP	
L A Y E R S	L I Q U I D	S O L I D	G E L D G E	S L U D G E	USE STD COLORS	C L E A R	C L O U D Y	O P A Q U E	SOLUBILITY S-PS-I DENSITY HOR L	A=AIR W=H2O	STD. UNIT	S OR I	+ OR -	+ OR -	+ OR -	+ OR -
A																
B																
C																
COMMENTS: <u>NO Sample</u>																
PCB CONC. _____ PPM FLASH POINT _____ °C OTHER TEST _____																
DATA REVIEWER: _____ DATA REVIEW DATE: _____																
FIELD REVIEWER: _____ FIELD REVIEW DATE: _____																
BULK GROUP: _____ WASTE STREAM: _____																
K GROUP NUMBER: _____ WASTE STREAM NUMBER: _____																
COMMENTS: _____																

KEMRON ENVIRONMENTAL

DRUM
INVENTORY
LOGDRUM NO. 1354PROJECT NO. SF 1867

PAGE _____ OF _____

PROJECT LOCATION SUPERIOR BARRELL & DRUM SITELOGGER C.C.

DATE _____

PROJECT CONTACT GARY BELANDSAMPLER C.C.

TIME _____

PHONE _____

WEATHER _____

DRUM TYPE: POLY-LINED ☐FIBER ☐STEEL ☐POLY ☒STAINLESS STEEL ☐NICKEL ☐LID TYPE: RINGTOP ☐CLOSE TOP ☒DRUM CONDITION: MEET DOT SPEC. ☐GOOD ☐FAIR ☐POOR ☒DRUM SIZE: 110 ☐85 ☐55 ☐42 ☐30 ☐16 ☐10 ☐5 ☐OTHER ☒

DRUM CONTENTS: VOLUME

FULL ☐3/4 ☐1/2 ☐1/4 ☐<1/4 ☒MT ☐OVERPACKED: No ☒YES ☐OVERPACK TYPE: FIBER ☐STEEL ☐POLY ☐

OVERPACK SIZE: _____

PHYS. STATE					COLOR	CLARITY			LAYER THICKNESS	FIELD ANALYSIS	
L	A	Y	E	R	S	USE STD COLORS	C L E A R	C L O U D Y	O P A Q U E	INCHES	pH _____ SU _____ PID/OVA _____ ppm
A	X						X				OTHER <u>1 GAL container</u>
B	X						X				DRUM LABELS/MARKINGS
C	X						X				DOT HAZ _____ UN/NA _____

MFG NAME eyesalineCHEMICAL NAME Eye Flushing Solution

ADDITIONAL INFORMATION _____

LABORATORY HAZARD CATEGORIZATION DATA

MARK IF DESCRIPTION DOES NOT MATCH THE ABOVE INFORMATION. IF SO, REJECT SAMPLE AND DO NOT PERFORM ANALYSIS

HAZARD CATEGORY: NLANALYST: pmDATE PERFORMED: 10/24/13RADIATION: POS ☐ NEG ☐ MREM/HR _____

PHYS. STATE					COLOR	CLARITY			WATER SOL.	REACT	pH	HEX DCM SOL	PER	OX	CN	SUL	BIEL-STEIN	FLASH POINT	PCBS (25ppm)	PCB TEST COMP	
L	A	Y	E	R	S	USE STD COLORS	C L E A R	C L O U D Y	O P A Q U E	SOLUBILITY S-PS-I DENSITY HOR L	A=AIR W=H2O	STD. UNIT	S OR I	+	OR	+	OR	+	OR	+	OR
A	X						X											<60°C	+	N	
B	X					Colorless	X			4	N	7	N	N	N	N	N	N	+	U	
C	X						X											+	M		

COMMENTS: _____

BAFF SOLN

PCB CONC. _____ PPM

FLASH POINT _____ °C

OTHER TEST _____

DATA REVIEWER: _____

DATA REVIEW DATE: _____

FIELD REVIEWER: _____

FIELD REVIEW DATE: _____

BULK GROUP: _____

WASTE STREAM: _____

GROUP NUMBER: _____

WASTE STREAM NUMBER: _____

COMMENTS: _____

KEMRON ENVIRONMENTAL

DRUM
INVENTORY
LOGDRUM NO. 1355PROJECT NO. SF 1867

PAGE _____ OF _____

PROJECT LOCATION SUPERIOR BARRELL & DRUM SITELOGGER C.C.DATE 10/23/13PROJECT CONTACT GARY BELANDSAMPLER C.C.

TIME _____

PHONE _____

WEATHER _____

DRUM TYPE: POLY-LINED ☐ FIBER ☐ STEEL ☐ POLY ☒ STAINLESS STEEL ☐ NICKEL ☐LID TYPE: RINGTOP ☐ CLOSE TOP ☒DRUM CONDITION: MEET DOT SPEC. ☐ GOOD ☐ FAIR ☐ POOR ☒DRUM SIZE: 110 ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☐ OTHER 1 GalDRUM CONTENTS: VOLUME FULL ☒ 3/4 ☐ 1/2 ☐ 1/4 ☐ <1/4 ☐ MT ☐OVERPACKED: No ☐ YES ☐ OVERPACK TYPE: FIBER ☐ STEEL ☐ POLY ☐ OVERPACK SIZE: _____

PHYS. STATE					COLOR	CLARITY			LAYER THICKNESS	FIELD ANALYSIS				
L	A	Y	E	R	S	USE STD COLORS	C	C	O	INCHES	pH	SU	PID/OVA	ppm
S	D	I	D	G	E	A	R	O	U		Q	U	E	OTHER
A	X						X							
B	X						X							
C	X						X							

DOT HAZ _____ UN/NA _____

MFG NAME eyesalineCHEMICAL NAME Eye Flushing solution

ADDITIONAL INFORMATION _____



LABORATORY HAZARD CATEGORIZATION DATA

MARK IF DESCRIPTION DOES NOT MATCH THE ABOVE INFORMATION. IF SO, REJECT SAMPLE AND DO NOT PERFORM ANALYSIS

HAZARD CATEGORY: NLANALYST: PLMDATE PERFORMED: 10/24/13RADIATION: POS ☐ NEG ☐ MREM/HR _____

PHYS. STATE					COLOR	CLARITY			WATER SOL.	REACT	pH	HEX DCM SOL	PER	OX	CN	SUL	BIEL-STEIN	FLASH POINT	PCBS (25ppm)	PCB TEST COMP	
L	A	Y	E	R	S	USE STD COLORS	C	C	O	SOLUBILITY S-PS-I DENSITY HORL	A=AIR W=H2O	STD. UNIT	S OR I	+	OR	+	OR	+	OR	+	OR
S	D	I	D	G	E	A	R	O	U	Q	U	E		-	-	-	-	-	-	-	NUMBER
A																		<60°C	+	N	
B																		+	U		
C																		+	M		

COMMENTS: _____

NL - sample

PCB CONC. _____ PPM

FLASH POINT _____ °C

OTHER TEST _____

DATA REVIEWER: _____

DATA REVIEW DATE: _____

FIELD REVIEWER: _____

FIELD REVIEW DATE: _____

BULK GROUP: _____

WASTE STREAM: _____

BULK GROUP NUMBER: _____

WASTE STREAM NUMBER: _____

COMMENTS: _____

KEMRON ENVIRONMENTAL		DRUM INVENTORY LOG		DRUM NO. <u>1356</u>																																																																																																													
PROJECT LOCATION <u>SUPERIOR BARRELL & DRUM SITE</u>		LOGGER <u>C.C.</u>	PROJECT NO. <u>SF 1867</u>																																																																																																														
PROJECT CONTACT <u>GARY BELAND</u>		SAMPLER <u>C.C.</u>	PAGE _____ OF _____																																																																																																														
PHONE _____		DATE <u>10/23/13</u>		TIME _____																																																																																																													
WEATHER _____																																																																																																																	
DRUM TYPE: POLY-LINED <input type="checkbox"/> FIBER <input type="checkbox"/> STEEL <input type="checkbox"/> POLY <input checked="" type="checkbox"/> STAINLESS STEEL <input type="checkbox"/> NICKEL <input type="checkbox"/> LID TYPE: RINGTOP <input type="checkbox"/> CLOSE TOP <input checked="" type="checkbox"/> DRUM CONDITION: MEET DOT SPEC. <input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR <input checked="" type="checkbox"/> DRUM SIZE: 110 <input type="checkbox"/> 85 <input type="checkbox"/> 55 <input type="checkbox"/> 42 <input type="checkbox"/> 30 <input type="checkbox"/> 16 <input type="checkbox"/> 10 <input type="checkbox"/> 5 <input type="checkbox"/> OTHER <u>1 GAL</u> DRUM CONTENTS: VOLUME FULL <input checked="" type="checkbox"/> 3/4 <input type="checkbox"/> 1/2 <input type="checkbox"/> 1/4 <input type="checkbox"/> <1/4 <input type="checkbox"/> MT <input type="checkbox"/> OVERPACKED: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> OVERPACK TYPE: FIBER <input type="checkbox"/> STEEL <input type="checkbox"/> POLY <input type="checkbox"/> OVERPACK SIZE: _____																																																																																																																	
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KEMRON ENVIRONMENTAL		DRUM INVENTORY LOG		DRUM NO. <u>1357</u>
PROJECT LOCATION <u>SUPERIOR BARRELL & DRUM SITE</u>		LOGGER <u>C.C.</u>	PROJECT NO. <u>SF 1867</u>	
PROJECT CONTACT <u>GARY BELAND</u>		SAMPLER <u>C.C.</u>	PAGE _____ OF _____	
PHONE _____		DATE <u>10/23/13</u>		TIME _____
WEATHER _____				
DRUM TYPE: POLY-LINED <input type="checkbox"/> FIBER <input type="checkbox"/> STEEL <input type="checkbox"/> POLY <input checked="" type="checkbox"/> STAINLESS STEEL <input type="checkbox"/> NICKEL <input type="checkbox"/>				
LID TYPE: RINGTOP <input type="checkbox"/> CLOSE TOP <input checked="" type="checkbox"/>				
DRUM CONDITION: MEET DOT SPEC. <input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR <input checked="" type="checkbox"/>				
DRUM SIZE: 110 <input type="checkbox"/> 85 <input type="checkbox"/> 55 <input type="checkbox"/> 42 <input type="checkbox"/> 30 <input type="checkbox"/> 16 <input type="checkbox"/> 10 <input type="checkbox"/> 5 <input type="checkbox"/> OTHER <u>1 GAL</u>				
DRUM CONTENTS: VOLUME FULL <input type="checkbox"/> 3/4 <input type="checkbox"/> 1/2 <input type="checkbox"/> 1/4 <input checked="" type="checkbox"/> <1/4 <input type="checkbox"/> MT <input type="checkbox"/>				
OVERPACKED: No <input checked="" type="checkbox"/> YES <input type="checkbox"/> OVERPACK TYPE: FIBER <input type="checkbox"/> STEEL <input type="checkbox"/> POLY <input type="checkbox"/> OVERPACK SIZE: _____				

PHYS. STATE					COLOR	CLARITY			LAYER THICKNESS	FIELD ANALYSIS	
L	A	I	S	G	USE	C	C	O	INCHES	pH	SU
Y	Q	O	L	L	STD	L	L	P		OTHER	PID/OVA
R	U	L			COLORS	E	O	A			
S	I	D				A	U	Q			
	D					R	D	U			
						Y	E	E			
A	X					X					
B											
C											

MFG NAME eyesaline
 CHEMICAL NAME Eye Flushing solution
 ADDITIONAL INFORMATION _____

<input type="checkbox"/> LABORATORY HAZARD CATEGORIZATION DATA MARK IF DESCRIPTION DOES NOT MATCH THE ABOVE INFORMATION. IF SO, REJECT SAMPLE AND DO NOT PERFORM ANALYSIS										HAZARD CATEGORY: <u>NL</u> ANALYST: <u>pm</u> DATE PERFORMED: <u>10/24/13</u>									
RADIATION: POS <input type="checkbox"/> NEG <input type="checkbox"/> MREM/HR _____																			

PHYS. STATE					COLOR	CLARITY			WATER SOL.	REACT	pH	HEX DCM SOL	PER	OX	CN	SUL	BIEL-STEIN	FLASH POINT	PCBS (25ppm)	PCB TEST COMP
L	A	I	S	G	USE	C	C	O	SOLUBILITY	A=AIR	STD.	S	+	+	+	+	+	<60°C	+	N
Y	Q	O	L	L	STD	L	L	P	S-PS-I	W=H2O	UNIT	OR	OR	OR	OR	OR	OR	OR	OR	U
R	U	L			COLORS	E	O	A	DENSITY			I	-	-	-	-	-	-	-	M
S	I	D				A	U	Q	HORL											B
	D					R	D	U												E
						Y	E	E												R
A	X					X														
B					Colorless				4	N	7	N	N	N	N	N	N	N		
C																				

COMMENTS: Buf soln

PCB CONC. _____ PPM FLASH POINT _____ °C OTHER TEST _____
 DATA REVIEWER: _____ DATA REVIEW DATE: _____
 FIELD REVIEWER: _____ FIELD REVIEW DATE: _____
 BULK GROUP: _____
 WASTE STREAM: _____
 WASTE STREAM NUMBER: _____
 COMMENTS: _____

KEMRON ENVIRONMENTAL

DRUM INVENTORY LOG

DRUM NO. 1358

PROJECT NO. SF 1867

PAGE _____ OF _____

PROJECT LOCATION SUPERIOR BARRELL & DRUM SITE

LOGGER C.C.

DATE 10/23/13

PROJECT CONTACT GARY BELAND

SAMPLER C.C.

TIME _____

PHONE _____

WEATHER _____

DRUM TYPE: POLY-LINED ☐

FIBER ☐

STEEL ☐

POLY ☒

STAINLESS STEEL ☐

NICKEL ☐

LID TYPE: RINGTOP ☐

CLOSE TOP ☒

DRUM CONDITION: MEET DOT SPEC. ☐

GOOD ☐

FAIR ☐

POOR ☒

DRUM SIZE: 110 ☐

85 ☐

55 ☐

42 ☐

30 ☐

16 ☐

10 ☐

5 ☐

OTHER 1 GAL

DRUM CONTENTS: VOLUME

FULL ☒

3/4 ☐

1/2 ☐

1/4 ☐

<1/4 ☐

MT ☐

OVERPACKED:

NO ☒

YES ☐

OVERPACK TYPE: FIBER ☐

STEEL ☐

POLY ☐

OVERPACK SIZE: _____

PHYS. STATE					COLOR	CLARITY			LAYER THICKNESS	FIELD ANALYSIS	
L	A	I	S	G	S	USE STD COLORS	C	C	O	INCHES	pH _____ SU _____ PID/OVA <u>0</u> ppm OTHER <u>1-GAL (VIRGIN)</u>
Y	Q	U	L	E	L		L	P	A		
R	I	I			D		C	L	O		
S	D				E		A	O	A		
							R	U	Q		
							Y	D	U		
A	<input checked="" type="checkbox"/>						<input checked="" type="checkbox"/>				
B											
C											

DRUM LABELS/MARKINGS

DOT HAZ _____

UN/NA _____

MFG NAME eyesaline

CHEMICAL NAME Eye Flushing solution

ADDITIONAL INFORMATION _____

LABORATORY HAZARD CATEGORIZATION DATA

MARK IF DESCRIPTION DOES NOT MATCH THE ABOVE INFORMATION. IF SO, REJECT SAMPLE AND DO NOT PERFORM ANALYSIS

HAZARD CATEGORY: NL

ANALYST: Pm

DATE PERFORMED: 10/24/13

RADIATION: POS ☐

NEG ☐

MREM/HR _____

PHYS. STATE					COLOR	CLARITY			WATER SOL.	REACT	pH	HEX DCM SOL	PER	OX	CN	SUL	BEL-STEIN	FLASH POINT	PCBS (25ppm)	PCB TEST COMP	
L	A	I	S	G	S	USE STD COLORS	C	C	O	SOLUBILITY S-PS-I DENSITY HORL	A=AIR W=H2O	STD. UNIT	S OR I	+	OR	+	OR	+	OR	+	OR
Y	Q	U	L	E	L		L	P	A												
R	I	I			D		C	L	O				S	+	+	+	+	+	<60°C	+	N
S	D				E		A	O	A				O	OR	OR	OR	OR	OR	OR	OR	U
							R	U	Q				I	-	-	-	-	-	-	-	M
							Y	D	U												B
A	<input checked="" type="checkbox"/>						<input checked="" type="checkbox"/>														E
B																					R
C																					

COMMENTS: _____

NO SAMPLES

PCB CONC. _____ PPM

FLASH POINT _____ °C

OTHER TEST _____

DATA REVIEWER: _____

DATA REVIEW DATE: _____

FIELD REVIEWER: _____

FIELD REVIEW DATE: _____

BULK GROUP: _____

WASTE STREAM: _____

GROUP NUMBER: _____

WASTE STREAM NUMBER: _____

COMMENTS: _____

Exhibit 3

MATERIAL SAFETY DATA SHEET

HMIS Ratings Health: 0
Flammability: 0
Reactivity: 0

Identity: Eyesaline® Solution - Product #s 32-000400, 32-000401, 32-000502, 32-001050

Section I

Manufacturer: Sperian Eye & Face Protection, Inc. (a Honeywell Company)

Emergency Telephone: 1-800-430-5490

Address: 825 East Highway 151
Platteville, WI 53818 USA

Information Telephone: 1-800-543-4842

Date Prepared: 06/13/12

Section II - Hazardous Ingredients/Identify Information

Hazardous Components (Specific Chemical Identity; Common Name(s))	OSHA PEL	ACGIH TLV	Other limits recommended	% (optional)
BENZALKONIUM CHLORIDE CAS #8001-54-5	NONE	NONE	N/A	<0.1%

Section III - Physical/Chemical Characteristics

Boiling Point: 200°F (93.3°C)	Specific Gravity (H ₂ O)=1: NOT DETERMINED
Vapor Pressure (mm Hg.): 760	Melting Point: N/A
Vapor Density (Air = 1): NOT DETERMINED.	Evaporation Rate (Butyl Acetate = 1): NOT DETERMINED
Solubility in Water: 100%	
Appearance and Odor: COLORLESS LIQUID WITH NO DISCERNABLE ODOR.	

Section IV - Fire and Explosion Hazard Data

Flash Point (Method Used): N/A	Flammable Limits:	LEL: N/A	UEL: N/A
Extinguishing Media: THIS IS A NONFLAMMABLE AQUEOUS SOLUTION.			
Special Fire Fighting Procedures: N/A			
Unusual Fire and Explosion Hazards: N/A			

Section V - Reactivity Data

Stability	Unstable: NO Stable: YES	Conditions to Avoid: THIS PRODUCT IS STABLE AND CONSIDERED NON-REACTIVE UNDER NORMAL CONDITIONS OF STORAGE AND USAGE.
Incompatibility (Materials to Avoid): NONE KNOWN		
Hazardous Decomposition or Byproducts: NONE		
Hazardous Polymerization	May Occur: NO Will Not Occur: YES	Conditions to Avoid: NONE

Section VI - Health Hazard Data

Route(s) of Entry: Inhalation? NO Skin? NO Ingestion? YES
Health Hazards (Acute and Chronic): INGESTION OF VOLUMES IN EXCESS OF 20 LITERS MAY CAUSE GASTRIC IRRITATION.
Carcinogenicity: NTP? NO IARC Monographs? NO OSHA Regulated? NO
Signs and Symptoms of Exposure: N/A
Medical Conditions Generally Aggravated by Exposure: N/A
Emergency First Aid Procedures: NOTES TO PHYSICIAN: IN THE UNLIKELY EVENT OF RAPID INGESTION OF LARGE VOLUMES OF THE SOLUTION, INDUCE VOMITING AND OBSERVE THE PATIENT FOR GASTRIC IRRITATION.

Section VII - Precautions for Safe Handling and Use

Steps to Be Taken in Case Material is Released or Spilled: FLUSH AREA WITH WATER. THE SOLUTION IS NOT RCRA HAZARDOUS WASTE.
Waste Disposal Method: N/A
Precautions to Be Taken in Handling and Storing: DO NOT FREEZE OR EXPOSE TO TEMPERATURES IN EXCESS OF 110°F (43°C) FOR EXTENDED PERIODS.
Other Precautions: N/A

Section VIII - Control Measures

Respiratory Protection: N/A		
Ventilation	Local Exhaust: N/A Mechanical: N/A	Special: N/A Other: N/A
Protective Gloves: N/A		Eye Protection: N/A
Other Protective Clothing: N/A		
Work Hygienic Practices: N/A		

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Honeywell Safety Products, LLC
(EyeSaline)

900 Douglas Pike

Smithfield, RI 02917

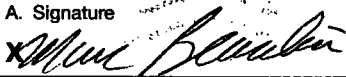
Attn: Robert Peterson, President/CEO

2. Article Number

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature


☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7012 1640 0001 8519 2548

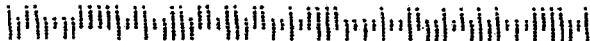
UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Bonnie Hriczko
U.S. Environmental Protection Agency
Removal Action Branch-(MS-211)
Building 205
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679



From: (202) 942-5000
Sarah Greer
Arnold & Porter LLP
555 12th Street, N.W.

Washington, DC 20004

Origin ID: RDVA

FedEx
Express



J14101402070326

SHIP TO: (732) 321-8647

BILL SENDER

Bonnie Hriczko
US Environmental Protection Agency
Removal Action Branch
2890 Woodbridge Ave, MS-211
Edison, NJ 08837

Ship Date: 20MAR14
ActWgt: 0.5 LB
CAD: 103991047/WSX12500

Delivery Address Bar Code



Ref # 0016151.00009-4420
Invoice #
PO #
Dept #

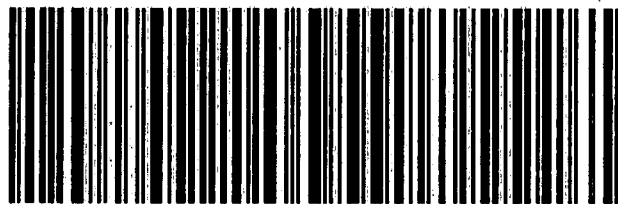
FRI - 21 MAR 10:30A
PRIORITY OVERNIGHT

TRK# 7982 8426 3820

0201

DSR
08837
NJ-US
EWR

E2 LDJA



FOLD on this line and place in shipping pouch with bar code and delivery address visible

1. Fold the first printed page in half and use as the shipping label.
2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.